

FILED 3 SEP '15 10:18 USDC-ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JOSEPH WALSH
(Enter full name of plaintiff(s))

Plaintiff(s),

v.

BRYANT ENGE
MAYOR CHARLIE HALES
CITY OF PORTLAND
(Enter full name of ALL defendant(s))

Defendant(s).

3:15 CV-1666 BR...
Civil Case No. 3:15 CV-1666 BR...
(to be assigned by Clerk of the Court)

COMPLAINT

Jury Trial Demanded
☐ Yes ☒ No

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: JOSEPH WALSH
Street Address: 7348 S.E. DIVISION ST.
City, State & Zip Code: PORTLAND OR 97206
Telephone No. 503 946-8428

Defendant No. 1

Name: BRYANT ENGE
Street Address: 1120 S.W. FIFTH AVE. RM 1250
City, State & Zip Code: PORTLAND OR 97204-1912
Telephone No. 503 823-6962

Defendant No. 2

Name: MAYOR CHARLIE HALE
Street Address: 1221 S.W. 4TH AVE.
City, State & Zip Code: PORTLAND OR 97204
Telephone No. 503 823-4120

Defendant No. 3

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No. _____

Defendant No. 4

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No. _____

II. JURISDICTION

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. A case involving the United States Constitution or federal laws or treaties is a federal question case. A case in which a citizen of one state sues a citizen of another state and the amount in damages claimed is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction (check all that apply)



Federal Question



Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory, or treaty right is at issue?

CONSTITUTION OF THE UNITED STATES
AMENDMENT NO. 1 "... AND TO PETITION THE
GOVT. FOR A REDRESS OF GRIEVANCES.

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state of citizenship _____

Defendant(s) state(s) of citizenship _____

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

THE MAYOR AND MR. ENGE ARE USING EXCLUSIONS
FOR FUTURE CITY COUNCIL MEETINGS TO BAN
ACTIVISTS FROM ATTENDING OR EVEN ENTERING
CITY HALL PROPERTY FOR EXTENDED PERIODS
OF TIME (SEE ATTACHMENT 1)

MR. ENGE IS ACTING AS MAYOR HATES' SUBORDINATE.
MAYOR HATES IS THE CHIEF DEFENDANT WHO
OBVIOUSLY CALLS THE SHOTS.

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

MR. ENGE HAD LITTLE INVOLVEMENT EXCEPT FOR SIGNING THE LETTER.

MAUDR HATES BELIEVES HE HAS AUTHORITY TO EXCLUDE ACTIVIST ORGANIZATIONS FROM FUTURE CITY COUNCIL MEETINGS AT WILL. (SEE ATTACHMENT 1)

SINCE INDIVIDUALS FOR JUSTICE IS A SMALL WATCHDOG GROUP BANNING ME IS BANNING I.F.J.

BEING PRESENT AT THE CITY COUNCIL MEETINGS IS IMPORTANT
BECAUSE WE ARE ALLOWED TO COMMENT ON EACH ITEM
ON THE AGENDA.

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

WE ARE ASKING FOR A TEMPORARY RESTRAINING ORDER AGAINST THE CITY OF PORTLAND AS DIRECTED BY MAYOR CHARLIE HALE TO EXCLUDE ACTIVISTS WHO HE CONSIDERS TO BE ACTING INAPPROPRIATELY. WE ALSO WOULD REQUEST A HEARING FOR A PERMANENT INJUNCTION AGAINST EXCLUSIONS. WE LEAVE IT TO THE COURT TO DECIDE ANY MONETARY COMPENSATION IF WE PREVAIL.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this ____ day of _____, 20__.

(Signature of Plaintiff(s))